

	A	B	C	D
1	Name	Affiliation	Date Received	Comment Code
2				
3				2-B
4				2-C
5				2-D
6				2-E
7				2-F
8				2-G
9				2-H
10				2-I
11				2-J
12	Ray Kinney	citizen	12/20/2013	2-K
13				3-A
14				3-B
15	Melissa Rohs	citizen	12/20/13	4-C

	A	B	C	D
16				27-B
17				27-C
18				27-D
19	Mary Lehman	citizen	3/18/14	28-B
20				28-C
21				28-D
22				30-G
23				30-P
24				30-Q
25				30-R
26				30-R2

	A	B	C	D
27	North Coast Basin Coalition	organization	3/19/14	30-S
28				30-S2
29				30-T
30	Spencer Miles	citizen	3/19/2014	31-D
31	Akia woods	citizen	3/19/14	32-A
32				35-D
33				35-F
34				35-G
35				35-J
36				35-L
37	Alan Kapuler	citizen	3/19/14	38-A
38				38-B
39	Shauna Boyd	citizen	3/20/14	40-B
40				40-C
41				41-A
42				41-B

	A	B	C	D
43	Fritzi Cohen	citizen	3/20/14	41-C
44				42-F
45				42-G
46				42-H
47				42-J
48				42-K
49				42-L
50				42-M
51				42- N
52				42-O
53				42-P
54				42-Q
55				42-R
56				42-S

	A	B	C	D
57	Nancy Webster	citizen	3/20/14	42-T
58	Susan Applegate	citizen	3/20/14	45-B
59				45-C
60				46-C
61				46-D
62				46-E
63				46-G
64				46-I
65				46-J
66				46-K
67				46-L
68				46-M
69				46-N

	A	B	C	D
70	Mary Camp	citizen	3/20/14	46-O
71				46-P
72	Oregon Coast Alliance	organization	3/20/14	48-F
73				48-G
74				48-H
75				48-K
76				48-L
77				48-M
78	Native Fish Society	organization	3/20/14	49-H
79	Pam Driscoll	citizen	3/19/14	50-A
80				50-B
81				53-D
82				53-H

	A	B	C	D
83	Oceanside Cleanwater Subcommittee	organization	3/15/14	53-I
84				53-J
85				54-A
86				54-B
87				54-C
88				54-D
89				54-E
90				54-F
91				54-G1
92				54-G2
93				54-G3

	A	B	C	D
94				54-G4
95				54-G5
96				54-G6
97				54-G7
98				
99	Beyond Pesticides	organization	3/20/14	54-H
100				55-M
101				55-N
102				55-O
103				55-P
104	Roberta Lindberg	citizen	3/20/14	55-Q
105				56-D
106				56-E
107	Rogue River Keeper			56-F

	A	B	C	D
108	Northwest Environmental Advocates	organization	3/20/14	57-GG
109				57-HH
110				57-II
111				57-II2
112				57-II3
113				57-II4
114				57-II5
115				
116	Northwest Environmental Advocates- Chris Frissell attachment	organization	3/20/14	57-CF-A
117				57-CF-B
118				57-CF-C
119				57-CF-D
120				57-CF-E

	A	B	C	D
121	Oregon Wild	organization	3/20/14	58-F
122				58-I
123	Ruth Duemler	citizen	3/20/14	59-A
124	Bill Montgomery	citizen	3/20/14	62-B
125				62-C
126				62-E
127				62-F
128	Lane County Audubon Society of Oregon	organization	3/20/14	69-B
129				69-C
130				69 - D
131				69-E
132				69-F
133				69-G
134				69-H

	A	B	C	D
				70-B
135				
				70-C
136				
137				70-D
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				70-H
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	A	B	C	D
142				70-I
143				70-J
144				70-K
145				70-L
146				70-M
147				70-M2
148	Beyond Toxics-Oregon	organization	3/18/14	70-N
149				70-O

	A	B	C	D
150	Oregon Farm Bureau, Oregon Cattlemen's Association, Oregonians for Food and Shelter, Oregon Seed Commission, Oregon Dairy Farmers Association, Oregon Wheat Growers League	organization	3/20/14	71-A
151				71-F
152				71-H
153				71-R
156	Umpqua Watersheds, Inc.	organization	3/20/14	75-C
164	Dale Buck	citizen	3/17/14	81-B
165	Audubon Society of Portland	organization	3/19/14	83-E
166				83-M

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1	Summary Main Comments
2	· Need to include toxic contamination impairment assessment for NPS--can't be done under current political climate.
3	Disapproval will hopefully help improve situation in OR and break up political log-jam so toxics can be addressed appropriately.
4	Urine samples in Triangle Lake show citizens with elevated 2,4-D and atrazine metabolites from drift in aerial applications.
5	Forestry use of glyphosate leads to risks of elevated body tissue concentrations.
6	Herbicide drift from aerial spraying during forestry application is a well known phenom in the risk microclimates of the Oregon Coast range
7	Investigation of the Triangle Lake (Lane County) human urine elevation of 2/4 D and atrazine metabolites, during times of year considered to be at low risk of persistence in the body, has caused multiagency level of concern
8	Current data is suggestive of widespread human uptake of these compounds [2,4 D and atrazine] and warrants investigation of Forest practices Act BMPs associated with aerial spraying in the coast range
9	Past assessment of data should be revisited to see if any of it suggests widespread exposures to forestry use herbicides have been affecting human and aquatic residents of our watersheds.
10	It is possible that other forestry use herbicide formulations [other than 2,4 D and atrazine] are also being transported off site to produce unintended exposures.
11	Does glyphosate adversely affect intestinal homeostasis, reducing nutrient uptake and contributing to pathogenicity?
12	Forestry use glyphosate applications in the high risk Oregon coastal mountains lead to risks of elevated body tissue concentrations, yet urine glyphosate is not an additional analyte in investigatory processes.
13	· Concerned about 2007 overspray on his property and wants us to consider toxic effects.
14	· Notes wildlife and fish just starting to come back. Recent testing of old domestic water supply still shows residual effects.
15	· Oregon needs to prioritize clean water (even for smallest streams) and guard against human-made landslides.

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16	There is no program that monitors private forestland clear-cuts, or spray and burn operations
17	<ul style="list-style-type: none"> · Need preventive measures to assure that forestry operations near Clear Lake won't make water undrinkable (get drinking water from lake and has observed small-lot foresters aerial and hand spraying pesticides/herbicides near lake.
18	How often testing should be done and how much will it cost?
19	<ul style="list-style-type: none"> · Very narrow or non-existent buffers along streams that flow into Siletz. Clear cut to banks and aerial spraying over cuts.
20	<ul style="list-style-type: none"> · Concerned about contamination of drinking water (Newport gets water from Siletz), fish and soil contamination from spraying. Criminal that state does not provide better protections..especially as rate of clear cutting/forestry activities increase due to increase in China exports.
21	<ul style="list-style-type: none"> · No pesticide mngt measures are in use in ag. lands.
22	OR must increase buffers for the application of pesticides to both fish and non-fish bearing streams and take other actions to prevent pesticides from entering water that affects people, fish, and wildlife. Community watersheds are routinely exposed to the timber industry's aerial spraying of toxic pesticides.
23	Oregon riparian buffers for pesticide use are woefully inadequate. Does not agree with EPA/NOAA that Oregon "may" have adequate stream buffers for pesticide use on streams with salmon but is encouraged that NOAA/EPA find that the state doesn't have good buffers on non-fish bearing streams. Most drinking water flows through non-fishbearing streams.
24	Oregon's pesticide discharge permit allows spraying forest canopy over water, which will enter drinking water and affect fish and wildlife.
25	State's failure to monitor water quality after spraying ensures that need for better buffers and laws won't occur.
26	DEQ monitoring in Jetty Creek after spray was positive for glyphosate showing legal buffers aren't working.

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27	Thinks NOAA/EPA are wrong for lauding Oregon's Pesticide Stewardship Partnership Program when there are not pilots in coastal area.
28	EPA has not revised its pesticide labels to reflect the restrictions NMFS said were necessary to protect ESA-listed salmon.
29	Based on above two points, doesn't see how NOAA/EPA can find that OR provides sufficient protection to fish-bearing streams.
30	· Timber companies are unaccountable for overuse of pesticides, landslides caused by poorly maintained logging roads, and increased sediment load in our rivers which inhibit salmon spawning ability.
31	· Supports disapproval. Echoes Beyond Toxic's letter: http://www.beyondtoxics.org/wp-content/uploads/2014/03/CZARA_BeyondToxicsFindings2014March18.pdf
32	· Clear Lake is directly threatened by pesticide and herbicide applications inside the watershed, as well as land disturbance on steep slopes near the lake from logging operations.
33	· Water District tried to prevent the spraying of fertilizers, herbicides and pesticides inside the Clear Lake watershed. The board was informed that there was nothing that could be done until it could be proven that something had actually harmed the water - after the spraying had been allowed. The District had to explain to customers that it has no power to prevent non-point pollution of Clear Lake, short of litigation after the fact.
34	· The protection zone language for herbicide spraying was purposefully written by Lane County to be completely ineffective as far as application to logging operations inside the watershed, and minimal as to pollution from other human activities.
35	· NOAA/EPA need to require Oregon to provide not only a solid framework of basic management measures, but also a detailed and concrete list of additional management measures to actually protect riparian areas, and provide substantially increased protections for fertilizer, herbicide and pesticide applications near fish-bearing and non-fish bearing streams.
36	Thousands of coastal residents currently face the prospect of drinking water laced with fertilizer, pesticides, herbicides and sediment. This is a health risk, as well as being costly for the drinking water suppliers such as Heceta Water District.
37	There is excessive and indiscriminate use of toxic chemical poisons in land management, including agriculture and tree farms.
38	We need better oversight and management of the use of toxics.
39	Spraying and burning also occurs very close to (and over) homes causing health problems within a sole source aquifer and is contaminating drinking water. This should not be allowed.
40	Attempting to relocate during spray/burn events causes financial hardship and spray/burn permits can last for months. Owners are given no warning when activities will occur. Property values are lowered and no one would buy home if tried to sell due to publicity of harmful forestry activities in area.
41	Supports disapproval and Lisa Arkin's (Beyond Toxics) letter
42	Lives in WA and notes WA aquaculture and USDA spray directly over estuaries--state and local authorities are reluctant to stop them.

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43	NOAA/EPA need to look at WA's pesticide practices too. Commentor believes WA pay "lip service" to the 100ft buffer requirements they have for pesticide application but lack of enforcement leads to impaired waters and starfish die-offs.
44	Because its been clearcut, a lot of spraying has occurred in drinking water watershed. Drinking water had tested positive for glyphosate.
45	No coordination between DEQ/ODF to conduct pesticide monitoring in timely manner and community is given no warning of spraying.
46	· No monitoring of airial drift of pesticide even when OR Health Admin says can drift for 2-4 miles.
47	Sept. 16, 2012. observed aerial spraying taking place in their watershed, without warning. Applied MSO, Agsurf Sulfomet Extra Herbicide, and Accord XRT II ("industrial herbicide")
48	ODF does not inform the public of the exact date of an activity such as aerial sprying nor which chemicals will actually be used.
49	A five year history of pesticide use in the watershed was not available from ODF when requested.
50	OHA toxicoligist indicates that limited research about the long term effects of combining these various chemicals.
51	York Johnson, North Coast Basin Coordinator ODEQ, agreed with concern about aerial spraying of the watershed, but indicated there was insufficient funding to test for water contamination in that water source, and no way to coordinate with the timber company..
52	ODEQ lab presently does not have capacity to test for Glyphosate, which is found in Accort XRT II, but working on a solution.
53	Notices were received about aerial spaying to occur in the next 6 months in the watershed by Olympic Resource Management and Stimson Lumber for numerous pesticides, but no specific dates provided.
54	OHA has indicated that spray applied by helicopter or plan can move two to three miles from the application site.
55	OHA has indicated that higher levels have been found in nearby residents urine when spraying on private timber lands has occurred.
56	There is no official process in place to inform businesses and residents of upcoming spraying.

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57	It would seem logical and prudent to err on the side of caution regarding the use of these chemicals, since there are possible unknown health effects on people and other living beings. Also there is no testing for soil contamination during spraying.
58	Large industry (forestry roads and spraying) is impacting water quality. OR needs laws to protect water quality. Need to use CNP to improve these issues and laws to provide better oversight.
59	Large companies and large landholdings are doing a large amount of activities [massive aerial spraying] that impact us all. These activities require oversight from laws that effectively reign in pollution released into our waterways.
60	State is not doing enough to prevent polluted runoff from forestry--especially related to timber harvesting and riparian protection (fish and nonfish-bearing streams and for pesticide application).
61	Concerned about chemical use and its impacts on neighboring property. Cites example of husband experiencing side effects and environmental impacts from nearby pesticide use and contamination of domestic water supplies. Need to do more than just adhere to label requirements--that shouldn't be all that is legally required for industry to meet.
62	Asked ODF to notify about pesticide use, then were not notified.
63	OR needs to protect surface drinking water in Deer Creek Watershed...critical source of water for residents. Keeping aquifers free of toxic chemicals are critical for providing and protecting water for the entire community of the Deer Creek watershed.
64	Ever growing concern by residents in the Illinois Valley about the use of ODF approved pesticides on forestlands and damages being done to neighboring small organic farmers, vineyard owners, natural forest land owner/practitioners and other community members.
65	It appears that little is understood by chemical users of the impacts these chemicals have on their neighbors, adjoining watersheds and the larger community. It seems taken for granted that the least and instructions of the chemical company is all they need to consider, because that is the legal requirement. The ODF and legal system supports use of harmful chemicals.
66	Claims to have visited a doctor who believes Orville's liver and health issues are the result of toxic exposure and agrees that adjacent land pesticides use makes sense. Many costs to family.
67	impacts to their land from adjacent chemical use far exceeded value of timber cut on adjacent land
68	Over past years we have been living under constant fear of what toxic chemicals sprayed into the headwaters of our land and water collections systems would mean to our family and community and environment.
69	Ample proof that these chemicals are toxic and violating basic human rights. Imperative that immediate changes are made to Oregon's pesticide spray laws, regulations, policies and rules. We need stronger federal oversight and protection.

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70	These chemicals do not know property lines. They outgas for years as they decompose. Reside in soil in degraded forms which can be more toxic than the initial compound
71	We have a right to know what are in the chemical compounds, including the inerts. Right to know what is in our air and water and may be causing health conditions such as liver disease, cancer, auto immune and reproductive illnesses. Changing our own and children's DNA.
72	Drinking waters are surrounded by private forest land or are below forest operations. 20ft buffers on fish-bearing streams do not protect from sedimentation and pesticide/herbicide use.
73	Concerned about ODF's vague public notification requirements when spraying.
74	ODF/DEQ don't have regular testing protocols for pesticides after sprays.
75	Exposure of drinking water supply to pesticide and herbicide residue is a related common and serious health risk for residents in small towns on the coast.
76	There is no regular testing protocol for herbicides
77	The Department of Forestry's notification of spray requirements are extremely vague.
78	OR doesn't have programs in place to protect streams/fish from polluted runoff from pesticide use on forest land or monitor pesticide use and impacts.
79	Water shortages and toxins are big concerns as we enter "climate chaos".
80	There is aerial spraying on Oregon's private forests that get in the waters and has also harmed rural residents and their animals and organic farming ... we must take strong stands to protect the people and the surrounding environment.
81	Herbicide spraying of logging roads and clear cuts with ensuing run-off into the water supply are a well-established health risk.
82	DOH only requires inspection of community drinking water for organic toxics every 3 yrs. Needs to be changed so that there is on site real time monitoring during applications of herbicide to assure no contamination of streams and wetlands in the watershed. Water samples need to be taken within hours of the spraying to verify that none of the chemicals have contaminated the streams.

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83	Currently the monitoring of spraying operations and testing of waters immediately after the spraying is essentially non-existent.
84	The situation at present is clearly inadequate to prevent potentially disastrous contamination of our drinking water.
85	Supports disapproval even though recognizes penalties will hurt programs working to do good.
86	OR needs improved pesticides application restrictions and protections for all classes of streams in both forestry and agricultural areas. Additionally, we encourage EPA and NOAA to require even greater pesticide protection standards for all land use areas within the Oregon Coastal Zone to prevent many of the unmonitored dangers that these chemicals pose to humans and aquatic species, like salmon.
87	Supports NOAA/EPA rationales for why OR hasn't meet CZARA requirements, including concerns raised about ag.
88	Oregon's pesticide laws, forestry management laws, clean water laws, and its implementing regulatory programs fail to adequately protect coastal zone resources and the people living within the coastal zone from the dangers of the increasing use of pesticides across all land uses and activities, but
89	Although NOAA/EPA found Oregon's state-level frameworks and actions to address pesticide water quality controls sufficient and even commendable because of their monitoring mandates and multi-agency management team, none of these pilot monitoring programs are occurring in the coastal zone.
90	EPA and NOAA improperly assume that, should riparian buffer standards for type N streams and monitoring programs within the coastal zone adhere to existing state laws and programs concerning water quality and pesticides, then Oregon's CNPCP would warrant approval. We disagree because existing state and federal laws fail to address large swaths of the pesticide application activities and fail to collect critical pesticide application and risk data.
91	Documented in a recent report, Oregon's Industrial Forests and Herbicide Use: A Case Study of Risk to People, Drinking Water and Salmon, private forestry operations in Oregon operate under antiquated and loose regulations, allowing aerial spraying and unmonitored applications of pesticides as compared to their federal forestry operation and border-state counterparts.
92	Specifically 1) There are known endocrine disrupting chemicals entering our drinking water sources and fish-bearing streams.
93	2) Oregon does not require a no-spray buffer near homes and schools.

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94	3) Aerial herbicide sprays regularly occur directly over headwaters and tributaries of protected salmon streams.
95	4) Oregon permits pesticides to be sprayed with only the smallest protective buffer of 60 feet from salmon and steelhead streams—a buffer significantly smaller than other Northwest states with similar forest and river ecosystems.
96	5) Stricter chemical and pesticide rules apply in neighboring states with heavy forestry industries.
97	6) Under the current administrative rules, the Oregon Forest Practices Act prohibits researchers, doctors and the public from obtaining accurate information about what types and quantities of herbicides are sprayed
98	
99	Cites environmental and health risks from glyphosate and other pesticides. Also expressed concerns regarding unknown and unmonitored risks of pesticides.
100	Analysis of pesticide application records in the Triangle Lake area west of Eugene shows that in the study area, more than 20 tons of pesticide products were applied in just a three-year period.
101	Supports Beyond Toxics Comments. Need mandatory spray buffers and vegetated riparian zone. Buffers around streams.
102	ODF rules require no buffer on type N streams even if they are the headwaters of streams which provide habitat for fish, including endangered coho. Extensive pesticide applications blanket these small streams, allowing these dangerous compounds to move downstream of harvest areas to areas inhabited by fish . When no buffer of any kind is required, it is obvious that pesticides get into these streams when the land on both sides of them, is sprayed.
103	Assisted in developing the response for Beyond Toxics of Eugene in developing information for their comment letter. The comments show that current pesticide management resulted in extensive spraying over small, non-fish bearing streams, primarily headwaters of streams which provide habitat for endangered Coho.
104	Without requirements for a riparian leave zone, there is no possibility for limiting the amount of pesticide reaching such small streams. A mandated spray buffer would provide some protection for these small streams, but a vegetated riparian zone would provide much better protection because it would allow some filtration of pesticides running off the hillside.
105	State has had over 16 yrs of notice backed by numerous studies/reports (1998 conditional approval, IMST, Ripstream, NMFS SONCC, Statewide Eval of FPA Effectiveness) that needs to do more with forestry yet they still claim voluntary is way to go.
106	NMFS recommended buffers range from 150-300ft far above 20ft that OR has (only for fish-bearing).
107	Need larger spray buffers (may be better than multi-agency approach that attempts to monitor pesticide impacts).

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108	Oregon's management measures for pesticides are not adequate to meet water quality standards including full support of desingated uses in Oregon and additional management measures are required.
109	Despite the lack of any additional ODA rules beyond the EPA pesticide labels, which have been demonstrated to be inadequate for protection of threatened coho, EPA and NOAA have not made any findings on the adequacy of Oregon's program to protect water quality and designated uses from pesticides applied to agricultural lands.
110	The federal agencies praise Oregon's Water Quality Pesticide Management Plan, which purportedly uses water monitoring data to drive so-called adaptive management actions, but the state does little monitoring of pesticides with which to make this work and there is no evidence it collects any data in coastal watersheds.
111	ODF Rules to protect fish-bearing sterams are inadequate to protect threatened and endangered species.
112	There are no additional ODA rules other than EPA labels that agricultural applicators need to adhered to.
113	There is no evidence that the State's Pesticide Plan collects data on the coast
114	Oregon is not listing for Pesticides as frequently as it should because DEQ's 303(d) Listing methodology does not establish that it will make such determinations.
115	
116	Aerial spraying is of greatest concern because on forest lands, it involves the largest quantities of chemical application over the largest areas.
117	Many water bodies have no mandatory application buffer, so chemical may be sprayed to the water's edge, and some level of overspray, indirect drift and delivery by surface runoff by groundwater transport through soil macropores into adjacent waters is inevitable. These include headwater streams above fish barriers and small wetlands and ponds.
118	Riparian retenion rules that allow extensive thinning on riparian standards to within 20' of the water's edge result in a riparian vegetative buffer that may be highly porous to aerial draft, rather than dense, unlogged riparian forest.
119	Sediment erosion may also provide a vehicle for pesticide delivery into waters.
120	Some studies have indicated some delivery of chemical residues at low measured concentrations. The Dent study may have underestimated the impacts. The Clackamas Study by USGS shows widespread pesticide residues

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121	Oregon needs greater controls on spraying chemicals such as pesticides and herbicides in coastal watersheds, especially near streams.
122	Chemicals used by the forest and ag industries have direct adverse effects on listed fish and other organisms.
123	Concerned about pesticide spraying. Secondhand account of citizens in western Lane County that had insecticide show up in blood tests and became ill after pesticide spraying. More needs to be done to protect human health from pesticide exposure. The Physicians for Social responsibility should be of some assistance.
124	Concerned with logging impacts from pesticide/herbicide use and habitat "mistreatment". There should be no aerial spraying close to known drinking water sources.
125	Need more regular monitoring of drinking water for pesticides/herbicides; designated uses and water quality standards in coastal watersheds are not protected.
126	There should be no aerial spraying close to known drinking water sources
127	I know our drinking water plants test SOCs every three years, how do you trend that?
128	Waters are at risk from pesticides and other toxic chemicals, oil and grease, sediment, salts, excess bacteria and nutrients released from agricultural and timber lands, from roads and urban areas, from construction and mining areas, from eroding stream banks, livestock, and faulty septic systems.
129	Especially concerned about inadequate buffer for aerial spray pesticide application. Oregon has an inadequately small no-spray buffer zone around fish-bearing streams and no effective program to protect non-fish bearing streams.
130	Pollutants have been shown to have sub-lethal and synergistic effects that inhibit immune response, and interfere with the ability of birds to forage and defend themselves and their young from predators.
131	pesticides persist in water and can bind to soil.
132	Pesticides may be aerially sprayed in Oregon despite lack of understanding of the effects of pesticide drift, persistence, and run-off during rains.
133	Compared to neighboring states, Oregon has an inadequately small no-spray buffer zone around fish-bearing streams and no effective program to protect non-fish bearing streams.
134	Verifiable management measures are needed to ensure that water quality is protected

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135	<p>Our comments address the inadequacies of Oregon's existing program to implement the required CZARA management measures, its inability and disinterest in evaluating the sufficiency of those management measures to ensure pesticides do not violate Oregon's water quality standards and impair its designated uses, its lack of a monitoring program to support such an evaluation, and its lack of practices that protect those designated uses.</p>
136	<p>Beyond Toxics report on pesticide/herbicide use in forestry shows that FPA lacks any program to protect Oregon streams and their beneficial uses (see report attached). Requires no pesticide buffer on non-fish streams even though neighboring states (WA, ID) require 25ft buffers. In non-fish bearing streams, amphibians and crawfish are affected by pesticide application</p>
137	<p>Unknown risks from synergistic interactions of chemicals mixed together.</p>
138	<p>Oregon has inadequate protection of fish-bearing streams and drinking water compared to neighboring states.</p>
139	<p>Oregon has no program to determine the presence of forestry pesticides in the air and resulting in drift and deposition onto surface waters and soils.</p>
140	<p>Herbicides (e.g., Atrazine) can persist in water and can bind with soil particles, so under OR's FPA, pesticides such as atrazine are sprayed into dry channels that become active in wetter months, carrying herbicides downstream to fish.</p>
141	<p>State doesn't have a program to protect groundwater/drinking water.</p>

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142	The EPA should require ODF, in consultation with DEQ, to exercise their authority to review, comment, and require modifications of forest vegetation management written plans based on an environmental and water quality risk assessment and proof of compliance with state and federal laws.
143	Oregon must develop a research program to determine if aerial application of herbicides is necessary for timber production. Oregon needs additional management measures to protect uses and water quality from pesticide drift.
144	Oregon has no program to determine if federal label laws are being complied with.
145	Evidence suggests that federal label restrictions for Atrazine, an Oregon-regulated herbicide, are not being followed. Also, poor record-keeping on pesticide applications
146	Pesticide application records are not available to the public. Spray records are kept by the applicator. Only the State Forester can request actual application records.
147	There may have been a violation of a 2004 court that required 300' buffers for pesticide application for 2,4-D.
148	FPA aerial and ground spray buffers are smaller than EPA legal requirements for atrazine. EPA labeling requires a 66' buffer for aerial and ground spray, but actual application followed state guidelines of 60' buffer on fish streams.
149	Amphibians that live in streams within clearcuts in the Oregon Coastal Range are in decline and have become a management concern. Amphibians are particularly vulnerable to absorbing toxins since they have moist, permeable skin and unshelled eggs that are directly exposed to soil and water.

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150	The AWQMP (and AWQMA Rules) meets and exceeds the federal statutory and regulatory requirements of CZARA
151	NOAA/EPA don't provide scientific data or substantial evidence that identifies agriculture land uses as a cause or significant contributor to water quality impairment in Oregon's coastal streams. There is no sound scientific evidence to demonstrate that agriculture lands within the coastal zone in fact cause or significantly contributing to water quality degradation. ODA is required to regulate, based on science, those agriculture activities that are causing the type of water pollution that prohibits the State from achieving and maintaining water quality standards.
152	Nowhere does CZARA or Section 6217(g) unconditionally require: (1) riparian buffers on agriculture land, (2) that landowners undertake efforts to restore lands to pre -agricultural uses and methods (removing agriculture from the land), (3) management measures that will not result in a reduction of nonpoint source pollution, (4) new or ad hoc water quality standards for pesticides, sediment, or any other listed pollutants, or (5) landowners to change land uses, implement management measures, or otherwise employ management measures that are not "economically achievable."
153	Oregon law encompasses all the 6217(g) requirements for pesticide management including when and what conditions pesticides can be applied, mixed, stored, loaded or used. Application must also follow FIFRA pesticide labels. Required site vegetation will also elp keep pesticides out of water. And pesticides aren't over applied since that cost farmers money and pesticides lost to run-off also costs money.
156	Mountains are soaked multiple times by helicopter with dangerous herbicides such as atrazine and 2 4 D (sometimes in combination with other herbicides and propellants) appear as sterile monocultures with minimal to nonexistent environmental contribution.
164	Pesticide Stewardship Programs, CAFO, and AWQMP already in place.
165	ODF and ODA's pesticide use programs fail to control polluted runoff from logging, in Type N streams, and cattle operations.
166	Watershed council completed a herbicide monitoring program found runoff from all sources of applications – road side use, and agricultural and forestry operation. While they may have applied it correctly there was still run-off and the rules were ineffective to truly protect water quality

	F	K	L	M	N
1	Pg. #	Dirk's Comments	Category of Comment	Notes	
2	1			not relevant to CZARA pesticides - 303(d) list toxics	
3	1		Program-general		X
4	18-20		Health - samples		X
5	22		Health - general		X
6	Att 2, p. 7		Health - drift		X
7	Att 2, p. 7		Health - samples		X
8	Att 2, p. 7		Health - samples		X
9	Att 2, p. 8		Health - general		X
10	Att 2, p. 8		Health - drift		X
11	Att 2, p. 11		Health - chemical effects		X
12	Att 2, p. 11		Health - samples		X
13	1		Health-Chemical Effects, Health- Drift		X-Health- Chemical Effects, X- Health- Drift
14	1		Health-Drinking Water		X
15	1			Not relevant to CZARA pesticides- 303(d) list toxics	

	F	K	L	M	N
16	1		Program -Monitoring		X
17	1		Program-Monitoring, Health- Drinking Water		X- Program Monitori ng, X- Health- Drinking Water
18			Program Monitoring		X
19	1		Program- Type N, Program- Type F		X
20	1		Health-Drinking Water, Env-Fish, Programs-State Programs		X Program State programs , X- Drinking Water
21	1		Programs-State Programs	comment not relevant to CZARA decision	X
22	3		Program - type N buffers; Program - type F buffers; Health - drinking water	general buffer comment?	X- Program- buffers, X-Health
23	4		Program - type N buffers; Program - type F buffers; Health - drinking water	general buffer comment?	X- Program- buffers, X-Health drinking water
24	4		Health - drinking water; Env - fish toxicity		X-Health- drinking water, X- Env-fish toxicity
25	4		Program - monitoring		X
26	4		Program - type N buffers; Program - type F buffers	general buffer comment?	X

	F	K	L	M	N
27	4		Program - State programs		X
28	4		Program - FIFRA		X
29	5		Program - general		X
30	1		Program-General		X
31	1				
32	2			Not a comment on approval decision	
33	3		Program – Scope of Authority		X
34	3		Program – Scope of Authority		X
35	4		Program – Type “N” Buffers; Program – Type “F” Buffers		X
36	5		Health – drinking water		X
37	1		Program - general		X
38			Program - general		X
39	1		Health - general; Health - drinking water		X-Health General,
40	2		Program - general; Program - notification		X - program-general,
41	1		Program - general		X
42	1			I don’t think this comment is relevant to the CZARA decision; it pertains to WA.	

	F	K	L	M	N
43	1			I don't think this comment is relevant to the CZARA decision; it pertains to WA.	
44	2		Health - drinking water		X
45	2		Program-Monitoring; Program-notification		X- program monitoring, x- program notification
46	2		Health - drift		X
47	Att. P.3		Program - notification		X
48	Att. P.3		Program - notification		X
49	Att. P.3		Program - spray records		X
50	Att. P.3		Health - chemical effects		X
51	Att. P.3		Program - monitoring		X
52	Att. P.4		Program - monitoring		X
53	Att. P.4		Program - notification		X
54	Att. P.4		Health - drift		X
55	Att. P.4		Health - chemical effects		X
56	Att. P.4		Program - notification		X

	F	K	L	M	N
57	Att. P.4		Health - chemical effects; Program - monitoring		X- program monitori ng, X- Health- chemical effects
58	1		Program - general		X
59	1		Program - general		X
60	2		Program – Type “F” Buffers; Program - Type "N" Buffers		X
61	5		Program - General		X
62	5		Program – Notification		X
63	6		Health – drinking water		X
64	1		Env – Drift (e.g., impacts to non- drinking water)		X
65	2		Legal - Other		X
66	5		Health – Chemical Effects (e.g., synergistic, unknown, revolatilization)		X
67	5		Program – Other		X
68	6		Program - General		X
69	7		Program - General		X

	F	K	L	M	N
70	7		Env – Other		X
71	7		Legal - Other		X
72	2		Health -Drinking Water, Program - Type F Buffers		X- Program Type F, X- Health- drinking water
73	2		Program - Spray Notification		X
74	2		Program - Monitoring		X
75			Health-Drinking Water		X
76			Program -Monitoring		X
77			Program - Notification		X
78	1		Program - general; Program - monitoring		X - program- general, program- monitori ng
79	1			comment not relevant to CZARA decision	
80	1		Program - general		X
81	1		Health - General		X
82	2		Program – Monitoring		X

	F	K	L	M	N
83	2		Program – Monitoring		X
84	3		Health – drinking water		X
85	1			Not relevant to CZARA pesticides - general comment	
86	1		Program - General; Env - Fish toxicity; Health - general		X-Program-General, X-Health-General, X-Env-
87	3			Not relevant to CZARA pesticides - general comment	
88	3		Program - General; Env - Fish toxicity; Health - general		X - program-general,
89	3		Program-General; Program-Monitoring		program-general, X-program
90	3		Program - Type "N"; Program - Monitoring; Program - Spray Records		X-program monitoring, x-Type N, X-
91	6		Program-General;Program-Monitoring		X-Program, General; X-Program-Monitoring
92	6		health - Chemical Effects; Env - Fish toxicity;		X-Health-chemical effects, X-Env-fish
93	6		Program - other;	Program - other (schools, homes)	X

	F	K	L	M	N
94	6		Program-Type N		X
95	6		Program - Type "F" Buffers;		X
96	6		Program-State Programs		X
97	6		Program-Spray Records		X
98					
99	4-5, 7-10		Health - Chemical Effects;		X
100	5		Program-General (Triangle Lake)		X
101			Program- Buffers N&F and mandatory riparian zone		X
102			Program - Type N		X
103			Program - Other data shows impacts from spraying		X
104	6		Program - General - Need Mandatory Buffers and Vegetated Riparian Zone		X
105	2 to 3			Not relevant to CZARA pesticides - general comment	
106	3		Program - Type "F" Buffers		X
107	3		Program - Type "F" Buffers; Type "N" Buffers		X

	F	K	L	M	N
108	47		Program-Other	Mtg water quality standards; call for additional mgmt measures	X
109	49		Program - State Program		X
110	49		Program-Monitoring		X
111	47		Program - Type "F" Streams		X
112	49		Program - State Program		X
113	49		Program - Monitoring		X
114	49			Not relevant to CZARA - 303(d) list	
115					
116	51		Env-other	Aerial spraying	X
117	53		Env-drift; Program-Type "N" Buffer; Program-Type "F" Buffer; Env-General		X- Program-buffer, X- Env-general
118	53		Program-Type "F" Buffer; Env-Drift		X
119	53		Env - Other	Sediment erosion increases pesticide delivery	X
120	54		Env-General;	Study results	X

	F	K	L	M	N
121	6	reviewed	Program - General, Program - Type N&F Buffers		X - program-general, x-type N&F buffers
122			Env - Fish Toxicity		X
123	1		Health – Samples		X
124	1		Health – drinking water		X
125	1		Program – Monitoring		X
126	3		Health – drinking water		X
127	3		Program – Monitoring		X
128	1		Env - General		X
129			Program – Type “N” Buffers		X
130	2		Health – Chemical Effects (e.g., synergistic, unknown, volatilization)		X
131	2		Env – Other		X
132	3		Program - General		X
133	3		Program – Type “N” Buffers; Program – Type “F” Buffers		X
134	3		Program – State Programs		X

	F	K	L	M	N
135	1		Program - State Programs, Program monitoring, Env-General		X- program monitori ng; X- State Programs , X-Env- General
136	2		Program - State Programs, Program monitoring, Env-General		X- program monitori ng, X- State Programs , X-Env- General
137	2,3		Health - Chemical Effects - Synergistic		X
138	3		Health - Drinking Water, Env - Fish Toxicity		X-Health- drinking water, X- Env-Fish Toxicity
139	3,4		Program Monitoring		X
140	4		Env - Fish Toxicity, Program Other		X- Program Other, X- Env-Fish Toxicity
141	4		Health - Drinking Water, Program General		X- Program General, X=Health- Drinking

	F	K	L	M	N
142	4,5		Program -State Programs		X
143	5		Program Monitoring - Research		X
144	5		Program - FIFRA		X
145	6		Program - Enforcement, Program - FIFRA		X Program-FIFRA, X-program enforcement
146	1		Program-Spray Records; Program-Notification		X Program Notification on X-spray
147	12-15		Program - Enforcement, Program - FIFRA		X-Program-FIFRA, X-program enforcement
148	19-22		Program - FIFRA		X
149	2		Env-Other	Fish Toxicity	X

	F	K	L	M	N
150	2, 11, 12, 13, 14	reviewed	Program - State Programs		X
151	4	reviewed	Program - FIFRA, Program - State Programs		X-State Program, X-FIFRA,
152	6	reviewed	Program - State Programs		
153	13	reviewed	Program - State Programs, Program - FIFRA		X-State Program, X-FIFRA
156	1				
164	1	Existing programs sufficient	Program - State Programs		X
165	1		Program - FIFRA, Program - State Programs		X-State Program, X-FIFRA
166	2		Program - State Programs		X

	A
1	Health-related
2	Comments:
3	Draft 7/1/2014
4	
5	HEALTH-SAMPLES
6	2-C
7	2-F
8	2-G
9	2-K
10	59-A
11	76-A
12	
13	HEALTH-CHEMICAL EFFECTS
14	2-J
15	3-A
16	42-M
17	42-R

	A
18	42-T
19	46-K
20	54-H
21	69 - D
22	70-D
23	
24	HEALTH-DRINKING WATER
25	3-B
26	27-C
27	28-C
28	30-G
29	30-P
30	30-Q
31	35-L
32	40-B
33	42-F

	A
34	46-G
35	48-F
36	48-K
37	53-J
38	54-G2
39	62-B
40	62-E
41	70-E
42	70-H
43	
44	
45	HEALTH-DRIFT
46	2-E
47	2-I
48	3-A
49	42-H

	A
50	42-Q
51	
52	Health-General
53	Comment Code
54	2-D
55	2-H
56	40-B
57	53-D
58	54-B
59	54-D

	B
1	
2	General, Samples, Drinking Water, Chemical Effects, Drift
3	
4	
5	
6	Urine samples in Triangle Lake show citizens with elevated 2,4-D and atrazine metabolites from drift in aerial applications.
7	Investigation of the Triangle Lake (Lane County) human urine elevation of 2/4 D and atrazine metabolites, during times of year considered to be at low risk of persistence in the body, has caused multiagency level of concern
8	Current data is suggestive of widespread human uptake of these compounds [2,4 D and atrazine] and warrants investigation of Forest practices Act BMPs associated with aerial spraying in the coast range
9	Forestry use glyphosate applications in the high risk Oregon coastal mountains lead to risks of elevated body tissue concentrations, yet urine glyphosate is not an additional analyte in investigatory processes.
10	Concerned about pesticide spraying. Secondhand account of citizens in western Lane County that had insecticide show up in blood tests and became ill after pesticide spraying. More needs to be done to protect human health from pesticide exposure. The Physicians for Social responsibility should be of some assistance.
11	Concerned about pesticide spraying. They have tested positive for pesticide/herbicides even though they run an organic farm.
12	
13	
14	Does glyphosate adversely affect intestinal homeostasis, reducing nutrient uptake and contributing to pathogenicity?
15	· Concerned about 2007 overspray on his property and wants us to consider toxic effects.
16	OHA toxicologist indicates that limited research about the long term effects of combining these various chemicals.
17	OHA has indicated that higher levels have been found in nearby residents urine when spraying on private timber lands has occurred.

	B
18	It would seem logical and prudent to err on the side of caution regarding the use of these chemicals, since there are possible unknown health effects on people and other living beings. Also there is no testing for soil contamination during spraying.
19	Claims to have visited a doctor who believes Orville's liver and health issues are the result of toxic exposure and agrees that adjacent land pesticides use makes sense. Many costs to family.
20	Cites environmental and health risks from glyphosate and other pesticides. Also expressed concerns regarding unknown and unmonitored risks of pesticides.
21	Pollutants have been shown to have sub-lethal and synergistic effects that inhibit immune response, and interfere with the ability of birds to forage and defend themselves and their young from predators.
22	Unknown risks from synergistic interactions of chemicals mixed together.
23	
24	
25	· Notes wildlife and fish just starting to come back. Recent testing of old domestic water supply still shows residual effects.
26	· Need preventive measures to assure that forestry operations near Clear Lake won't make water undrinkable (get drinking water from lake and has observed small-lot foresters aerial and hand spraying pesticides/herbicides near lake.
27	· Concerned about contamination of drinking water (Newport gets water from Siletz), fish and soil contamination from spraying. Criminal that state does not provide better protections..especially as rate of clear cutting/forestry activities increase due to increase in China exports.
28	OR must increase buffers for the application of pesticides to both fish and non-fish bearing streams and take other actions to prevent pesticides from entering water that affects people, fish, and wildlife. Community watersheds are routinely exposed to the timber industry's aerial spraying of toxic pesticides.
29	Oregon riparian buffers for pesticide use are woefully inadequate. Does not agree with EPA/NOAA that Oregon "may" have adequate stream buffers for pesticide use on streams with salmon but is encouraged that NOAA/EPA find that the state doesn't have good buffers on non-fish bearing streams. Most drinking water flows through non-fishbearing streams.
30	Oregon's pesticide discharge permit allows spraying forest canopy over water, which will enter drinking water and affect fish and wildlife.
31	Thousands of coastal residents currently face the prospect of drinking water laced with fertilizer, pesticides, herbicides and sediment. This is a health risk, as well as being costly for the drinking water suppliers such as Heceta Water District.
32	Spraying and burning also occurs very close to (and over) homes causing health problems within a sole source aquifer and is contaminating drinking water. This should not be allowed.
33	Because its been clearcut, a lot of spraying has occurred in drinking water watershed. Drinking water had tested positive for glyphosate.

	B
34	OR needs to protect surface drinking water in Deer Creek Watershed...critical source of water for residents. Keeping aquifers free of toxic chemicals are critical for providing and protecting water for the entire community of the Deer Creek watershed.
35	Drinking waters are surrounded by private forest land or are below forest operations. 20ft buffers on fish-bearing streams do not protect from sedimentation and pesticide/herbicide use.
36	Exposure of drinking water supply to pesticide and herbicide residue is a related common and serious health risk for residents in small towns on the coast.
37	The situation at present is clearly inadequate to prevent potentially disastrous contamination of our drinking water.
38	Specifically 1)There are known endocrine disrupting chemicals entering our drinking water sources and fish-bearing streams.
39	Concerned with logging impacts from pesticide/herbicide use and habitat "mistreatment". There should be no aerial spraying close to known drinking water sources.
40	There should be no aerial spraying close to known drinking water sources
41	Oregon has inadequate protection of fish-bearing streams and drinking water compared to neighboring states.
42	State doesn't have a program to protect groundwater/drinking water.
43	
44	
45	
46	Herbicide drift from aerial spraying during forestry application is a well known phenom in the risk microclimates of the Oregon Coast range
47	It is possible that other forestry use herbicide formulations [other than 2,4 D and atrazine] are also being transported off site to produce unintended exposures.
48	· Concerned about 2007 overspray on his property and wants us to consider toxic effects.
49	· No monitoring of airial drift of pesticide even when OR Health Admin says can drift for 2-4 miles.

	B
50	OHA has indicated that spray applied by helicopter or plane can move two to three miles from the application site.
51	
52	
53	Summary Main Comments
54	Forestry use of glyphosate leads to risks of elevated body tissue concentrations.
55	Past assessment of data should be revisited to see if any of it suggests widespread exposures to forestry use herbicides have been affecting human and aquatic residents of our watersheds.
56	Spraying and burning also occurs very close to (and over) homes causing health problems within a sole source aquifer and is contaminating drinking water. This should not be allowed.
57	Herbicide spraying of logging roads and clear cuts with ensuing run-off into the water supply are a well-established health risk.
58	OR needs improved pesticides application restrictions and protections for all classes of streams in both forestry and agricultural areas. Additionally, we encourage EPA and NOAA to require even greater pesticide protection standards for all land use areas within the Oregon Coastal Zone to prevent many of the unmonitored dangers that these chemicals pose to humans and aquatic species, like salmon.
59	Oregon's pesticide laws, forestry management laws, clean water laws, and its implementing regulatory programs fail to adequately protect coastal zone resources and the people living within the coastal zone from the dangers of the increasing use of pesticides across all land uses and activities, but especially in the activities of forestry and agriculture. In the Oregon Coastal Zone, neither FIFRA, nor state pesticides, agricultural, or forestry laws adequately protect or account for these known risks.

	C	I	J	K
1				
2				
3				
4				
5				
6	18-20	Health - samples		H7(a)
7	Att 2, p. 7	Health - samples		H7(a)
8	Att 2, p. 7	Health - samples		H7(a)
9	Att 2, p. 11	Health - samples		H7(a)
10	1	Health – Samples		H7(a)
11	1	Health-Samples		H7(a)
12				
13				
14	Att 2, p. 11	Health - chemical effects		H7(a)
15	1	Health-Chemical Effects, Health-Drift		H7(a)
16	Att. P.3	Health - chemical effects		H7(a)
17	Att. P.4	Health - chemical effects		H7(a)

	C	I	J	K
18	Att. P.4	Health - chemical effects; Program - monitoring		H7(a)
19	5	Health – Chemical Effects (e.g., synergistic, unknown, revolatilization)		H7(a)
20	4-5, 7-10	Health - Chemical Effects;		H7(a)
21	2	Health – Chemical Effects (e.g., synergistic, unknown, revolatilization)		H7(a)
22	2,3	Health - Chemical Effects - Synergistic		H7(a)
23				
24				
25	1	Health-Drinking Water		H.7(b)
26	1	Program-Monitoring, Health-Drinking Water		H.7(b)
27	1	Health-Drinking Water, Env-Fish, Programs-State Programs	general buffer comment ?	H.7(b)
28	3	Program - type N buffers; Program - type F buffers; Health - drinking water	general buffer comment ?	H.7(b)
29	4	Program - type N buffers; Program - type F buffers; Health - drinking water		H.7(b)
30	4	Health - drinking water; Env - fish toxicity		H.7(b)
31	5	Health – drinking water		H.7(b)
32	1	Health - general; Health - drinking water		H.7(b)
33	2	Health - drinking water		H.7(b)

	C	I	J	K
34	6	Health – drinking water		H.7(b)
35	2	Health -Drinking Water, Program - Type F Buffers		H.7(b)
36		Health-Drinking Water		H.7(b)
37	3	Health – drinking water		H.7(b)
38	6	health -drinking water; Env - Fish toxicity;		H7(b)
39	1	Health – drinking water		H.7(b)
40	3	Health – drinking water		H.7(b)
41	3	Health - Drinking Water, Env - Fish Toxicity		H.7(b)
42	4	Health - Drinking Water, Program General		H.7(b)
43				
44				
45				
46	Att 2, p. 7	Health - drift		
47	Att 2, p. 8	Health - drift		
48	1	Health-Chemical Effects, Health-Drift		
49	2	Health - drift		

	C	I	J	K
50	Att. P.4	Health - drift		
51				
52				
53	Pg. #	Category of Comment		
54	22	Health - general	(same as comment 2-K below - already addressed)	H7(a)
55	Att 2, p. 8	Health - general		needs to be addressed in general section
56	1	Health - general; Health - drinking water		H7(b)
57	1	Health - General		needs to be addressed
58	1	Program - General; Env - Fish toxicity; Health - general		H.7(E) cover in program-general
59	3	Program - General; Env - Fish toxicity; Health - general		cover in program-general

	A
1	Environmental-related
2	
3	Draft 7/1/2014
4	
5	
6	ENV-FISH TOXICITY
7	30-Q
8	53-D
9	54-B
10	54-D
11	54-G2
12	58-I
13	70-E
14	70-G
15	76-D
16	
17	ENV-DRIFT
18	46-I
19	
20	

	A
21	ENV-OTHER
22	46-O
23	57-CF-A
24	57-CF-D
25	69-E
26	70-O
27	
28	ENVIRONMEN TAL - GENERAL
29	Comment Code
30	57-CF-B
31	57-CF-E
32	69-B
33	70-B
34	70-C

	A
35	77-R

	B
1	
2	General, Fish Toxicity, Drift, Other
3	
4	
5	
6	
7	Oregon's pesticide discharge permit allows spraying forest canopy over water, which will enter drinking water and affect fish and wildlife.
8	Herbicide spraying of logging roads and clear cuts with ensuing run-off into the water supply are a well-established health risk.
9	OR needs improved pesticides application restrictions and protections for all classes of streams in both forestry and agricultural areas. Additionally, we encourage EPA and NOAA to require even greater pesticide protection standards for all land use areas within the Oregon Coastal Zone to prevent many of the unmonitored dangers that these chemicals pose to humans and aquatic species, like salmon.
10	Oregon's pesticide laws, forestry management laws, clean water laws, and its implementing regulatory programs fail to adequately protect coastal zone resources and the people living within the coastal zone from the dangers of the increasing use of pesticides across all land uses and activities, but especially in the activities of forestry and agriculture. In the Oregon Coastal Zone, neither FIFRA, nor state pesticides, agricultural, or forestry laws adequately protect or account for these known risks.
11	Specifically 1) There are known endocrine disrupting chemicals entering our drinking water sources and fish-bearing streams.
12	Chemicals used by the forest and ag industries have direct adverse effects on listed fish and other organisms.
13	Oregon has inadequate protection of fish-bearing streams and drinking water compared to neighboring states.
14	Herbicides (e.g., Atrazine) can persist in water and can bind with soil particles, so under OR's FPA, pesticides such as atrazine are sprayed into dry channels that become active in wetter months, carrying herbicides downstream to fish.
15	Pesticides harm salmon.
16	
17	
18	Ever growing concern by residents in the Willamette Valley about the use of ODF approved pesticides on forestlands and damages being done to neighboring small organic farmers, vineyard owners, natural forest land owner/practitioners and other community members.
19	
20	

	B
21	
22	These chemicals do not know property lines. They outgas for years as they decompose. Reside in soil in degraded forms which can be more toxic than the initial compound
23	Aerial spraying is of greatest concern because on forest lands, it involves the largest quantities of chemical application over the largest areas.
24	Sediment erosion may also provide a vehicle for pesticide delivery into waters.
25	pesticides persist in water and can bind to soil.
26	Amphibians that live in streams within clearcuts in the Oregon Coastal Range are in decline and have become a management concern. Amphibians are particularly vulnerable to absorbing toxins since they have moist, permeable skin and unshelled eggs that are directly exposed to soil and water.
27	
28	
29	Summary Main Comments
30	Many water bodies have no mandatory application buffer, so chemical may be sprayed to the water's edge, and some level of overspray, indirect drift and delivery by surface runoff by groundwater transport through soil macropores into adjacent waters is inevitable. These include headwater streams above fish barriers and small wetlands and ponds.
31	Some studies have indicated some delivery of chemical residues at low measured concentrations. The Dent study may have underestimated the impacts. The Clackamas Study by USGS shows widespread pesticide residues
32	Waters are at risk from pesticides and other toxic chemicals, oil and grease, sediment, salts, excess bacteria and nutrients released from agricultural and timber lands, from roads and urban areas, from construction and mining areas, from eroding stream banks, livestock, and faulty septic systems.
33	Our comments address the inadequacies of Oregon's existing program to implement the required CZARA management measures, its inability and disinterest in evaluating the sufficiency of those management measures to ensure pesticides do not violate Oregon's water quality standards and impair its designated uses, its lack of a monitoring program to support such an evaluation, and its lack of practices that protect those designated uses.
34	Beyond Toxics report on pesticide/herbicide use in forestry shows that FPA lacks any program to protect Oregon streams and their beneficial uses (see report attached). Requires no pesticide buffer on non-fish streams even though neighboring states (WA, ID) require 25ft buffers. In non-fish bearing streams, amphibians and crawfish are affected by pesticide application

	B
35	Water quality monitoring of a type-N (non-fish bearing) forest stream during and after herbicide spray operations (applied under OFPA rules and guidelines and FIFRA/labeling regulations) shows no evidence of detrimental impacts. Nevertheless, Oregon continues to support monitoring that would identify potential problems should they arise. ... Recent monitoring has not found a problem with contemporary forest aerial herbicide spray operations; in fact just the opposite. Oregon is currently monitoring for over 100 pesticides, which will allow the state to respond should herbicides be identified at unacceptable levels.

	C	I	J	K
1				
2				
3				
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6				
7	4	Health - drinking water; Env - fish toxicity		H.7(b)
8	1	Health - General		H.7(d)
9	1	Program - General; Env - Fish toxicity; Health - general		H.7(d)
10	3	Program - General; Env - Fish toxicity; Health - general		H.7(d)
11	6	health - Chemical Effects; Env - Fish toxicity;		H.7(d)
12		Env - Fish Toxicity		H.7(d)
13	3	Health - Drinking Water, Env - Fish Toxicity		H.7(d)
14	4	Env - Fish Toxicity, Program Other		H.7(e)
15	63-	Env-fish toxicity		H.7(d)
16				
17				
18	1	Env – Drift (e.g., impacts to non-drinking water)		H.7©
19				
20				

	C	I	J	K
21				
22	7	Env – Other		H.7(a)
23	51	Env-other	Aerial spraying	H.7(e)
24	53	Env - Other	Sediment erosion increases pesticide delivery	H.7(e)
25	2	Env – Other		H.7(e)
26	2	Env-Other	Fish Toxicity	H.7(d)
27				
28				
29	Pg. #	Category of Comment	Notes	
30	53	Env-drift; Program-Type "N" Buffer; Program-Type "F" Buffer; Env-General		H.7(e)
31	54	Env-General;	Study results	H.7(f)
32	1	Env - General		H.7(d)
33	1	Program - State Programs, Program monitoring, Env-General		address in programs
34	2	Program - State Programs, Program monitoring, Env-General		address in programs

	C	I	J	K
35	19, 21	Env-general	Study Results	H.7(f)

	A
1	Program-related
2	Comments:
3	Draft 7/1/2014
4	Comment Code
5	PROGRAM-GENERAL
6	2-B
7	30-T
8	31-D
9	38-A
10	38-B
11	40-C
12	41-A
13	45-B
14	45-C
15	46-D
16	46-M
17	46-N
18	49-H
19	50-B
20	54-B

	A
21	54-D
22	54-E
23	54-G1
24	55-M
25	55-Q
26	58-F
27	69-F
28	70-H
29	85-C
30	85-D
31	85-G
32	
33	PROGRAM-MONITORING
34	27-B
35	27-C
36	27-D
37	30-R
38	42-G

	A
39	42- N
40	42-O
41	42-T
42	48-H
43	48-L
44	49-H
45	53-H
46	53-I
47	54-E
48	54-F
49	54-G1

	A
50	57-II
51	57-II4
52	62-C
53	62-F
54	70-B
55	70-C
56	70-F
57	70-J
58	77-T
59	
60	PROGRAM- BUFFERS - Type N or Type F
61	28-B
62	30-G
63	30-P
64	30-R2

	A
65	35-J
66	46-C
67	48-F
68	54-F
69	54-G4
70	54-G5
71	55-N
72	55-O
73	55-Q
74	56-E
75	56-F
76	57-II2
77	57-CF-B
78	57-CF-C
79	58-F
80	69-C
81	69-G

	A
82	72-B
83	
84	PROGRAM-STATE PROGRAMS
85	
86	28-C
87	28-D
88	30-S
89	54-G6
90	57-HH
91	57-II3
92	69-H
93	70-B
94	70-C
95	70-I
96	71-A
97	71-F

	A
98	71-H
99	71-R
100	72-A
101	77-S
102	77-T
103	81-B
104	83-E
105	83-M
106	
107	PROGRAM- NOTIFICATION
108	40-C
109	42-G
110	42-J
111	42-K
112	42-P

	A
113	42-S
114	46-E
115	48-G
116	48-M
117	70-M
118	85-I
119	
120	PROGRAM-FIFRA
121	30-S2
122	70-K
123	70-L
124	70-M2
125	70-N
126	71-F
127	71-R
128	77-S
129	83-E
130	
131	PROGRAM- SCOPE OF AUTHORITY

	A
132	35-F
133	35-G
134	77-S
135	
136	PROGRAM- SPRAY RECORDS
137	
138	42-L
139	54-F
140	54-G7
141	70-M
142	
143	PROGRAM- OTHER
144	
145	46-L
146	54-G3
147	55-P
148	57-GG
149	70-G

	A
150	76-C
151	
152	PROGRAM- ENFORCEMENT
153	
154	70-L
155	70-M2
156	77-S
157	
158	

	B
1	General, Monitoring, Buffers, State Programs, FIFRA, Spray Notification, Scope of Authority, Other,
2	Enforcement
3	
4	Summary Main Comments
5	
6	Disapproval will hopefully help improve situation in OR and break up political log-jam so toxics can be
7	Based on above two points, doesn't see how NOAA/EPA can find that OR provides sufficient protection to
8	· Timber companies are unaccountable for overuse of pesticides, landslides caused by poorly maintained logging roads, and increased sediment load in our rivers which inhibit salmon spawning ability.
9	There is excessive and indiscriminate use of toxic chemical poisons in land management, including agriculture and tree farms.
10	We need better oversight and management of the use of toxics.
11	Attempting to relocate during spray/burn events causes financial hardship and spray/burn permits can last for months. Owners are given no warning when activities will occur. Property values are lowered and no one would buy home if tried to sell due to publicity of harmful forestry activities in area.
12	Supports disapproval and Lisa Arkin's (Beyond Toxics) letter
13	Large industry (forestry roads and spraying) is impacting water quality. OR needs laws to protect water quality. Need to use CNP to improve these issues and laws to provide better oversight.
14	Large companies and large landholdings are doing a large amount of activities [massive aerial spraying] that impact us all. These activities require oversight from laws that effectively reign in pollution released into our
15	Concerned about chemical use and its impacts on neighboring property. Cites example of husband experiencing side effects and environmental impacts from nearby pesticide use and contamination of domestic water supplies. Need to do more than just adhere to label requirements--that shouldn't be all that
16	Over past years we have been living under constant fear of what toxic chemicals sprayed into the headwaters of our land and water collections systems would mean to our family and community and environment.
17	Ample proof that these chemicals are toxic and violating basic human rights. Imperative that immediate changes are made to Oregon's pesticide spray laws, regulations, policies and rules. We need stronger federal oversight and protection.
18	OR doesn't have programs in place to protect streams/fish from polluted runoff from pesticide use on forest land or monitor pesticide use and impacts.
19	There is aerial spraying on Oregon's private forests that get in the waters and has also harmed rural residents and their animals and organic farming ... we must take strong stands to protect the people and the surrounding environment.
20	OR needs improved pesticides application restrictions and protections for all classes of streams in both forestry and agricultural areas. Additionally, we encourage EPA and NOAA to require even greater pesticide protection standards for all land use areas within the Oregon Coastal Zone to prevent many of the

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21	Oregon's pesticide laws, forestry management laws, clean water laws, and its implementing regulatory programs fail to adequately protect coastal zone resources and the people living within the coastal zone from the dangers of the increasing use of pesticides across all land uses and activities, but especially in the activities of forestry and agriculture. In the Oregon Coastal Zone, neither FIFRA, nor state pesticides,
22	Although NOAA/EPA found Oregon's state-level frameworks and actions to address pesticide water quality controls sufficient and even commendable because of their monitoring mandates and multi-agency management team, none of these pilot monitoring programs are occurring in the coastal zone.
23	Documented in a recent report, Oregon's Industrial Forests and Herbicide Use: A Case Study of Risk to People, Drinking Water and Salmon, private forestry operations in Oregon operate under antiquated and loose regulations, allowing aerial spraying and unmonitored applications of pesticides as compared to their
24	Analysis of pesticide application records in the Triangle Lake area west of Eugene shows that in the study area, more than 20 tons of pesticide products were applied in just a three-year period.
25	Without requirements for a riparian leave zone, there is no possibility for limiting the amount of pesticide reaching such small streams. A mandated spray buffer would provide some protection for these small streams, but a vegetated riparian zone would provide much better protection because it would allow some
26	Oregon needs greater controls on spraying chemicals such as pesticides and herbicides in coastal watersheds, especially near streams.
27	Pesticides may be aerially sprayed in Oregon despite lack of understanding of the effects of pesticide drift, persistence, and run-off during rains.
28	State doesn't have a program to protect groundwater/drinking water.
29	In my 45 years in coastal, Umpqua, and Rogue watersheds I have witnessed enormous environmental degradation, pollution and poisoning occurring as a direct result of Oregon's Forest Practice Laws, Right to
30	Coastal watersheds are impaired due to state gov'n't corruption and control by forest and chemical industry. Cites 2 examples of how EPA has gotten involved with two problems in OR (OR Health Authority's Hwy 36
31	State-sponsored liability-free chemical applications are rationalized as labor-saving.
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34	There is no program that monitors private forestland clear-cuts, or spray and burn operations
35	· Need preventive measures to assure that forestry operations near Clear Lake won't make water undrinkable (get drinking water from lake and has observed small-lot foresters aerial and hand spraying
36	How often testing should be done and how much will it cost?
37	State's failure to monitor water quality after spraying ensures that need for better buffers and laws won't
38	No coordination between DEQ/ODF to conduct pesticide monitoring in timely manner and community is given no warning of spraying.

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39	York Johnson, North Coast Basin Coordinator ODEQ, agreed with concern about aerial spraying of the watershed, but indicated there was insufficient funding to test for water contamination in that water source, and no way to coordinate with the timber company..
40	ODEQ lab presently does not have capacity to test for Glyphosate, which is found in Accort XRT II, but working on a solution.
41	It would seem logical and prudent to err on the side of caution regarding the use of these chemicals, since there are possible unknown health effects on people and other living beings. Also there is no testing for soil contamination during spraying.
42	ODF/DEQ don't have regular testing protocols for pesticides after sprays.
43	There is no regular testing protocol for herbicides
44	OR doesn't have programs in place to protect streams/fish from polluted runoff from pesticide use on forest land or monitor pesticide use and impacts.
45	DOH only requires inspection of community drinking water for organic toxics every 3 yrs. Needs to be changed so that there is on site real time monitoring during applications of herbicide to assure no contamination of streams and wetlands in the watershed. Water samples need to be taken within hours of the spraying to verify that none of the chemicals have contaminated the streams.
46	Currently the monitoring of spraying operations and testing of waters immediately after the spraying is essentially non-existent.
47	Although NOAA/EPA found Oregon's state-level frameworks and actions to address pesticide water quality controls sufficient and even commendable because of their monitoring mandates and multi-agency management team, none of these pilot monitoring programs are occurring in the coastal zone.
48	EPA and NOAA improperly assume that, should riparian buffer standards for type N streams and monitoring programs within the coastal zone adhere to existing state laws and programs concerning water quality and pesticides, then Oregon's CNPCP would warrant approval. We disagree because existing state and federal laws fail to address large swaths of the pesticide application activities and fail to collect critical pesticide
49	Documented in a recent report, Oregon's Industrial Forests and Herbicide Use: A Case Study of Risk to People, Drinking Water and Salmon, private forestry operations in Oregon operate under antiquated and loose regulations, allowing aerial spraying and unmonitored applications of pesticides as compared to their

	B
50	The federal agencies praise Oregon's Water Quality Pesticide Management Plan, which purportedly uses water monitoring data to drive so-called adaptive management actions, but the state does little monitoring of pesticides with which to make this work and there is no evidence it collects any data in coastal watersheds.
51	There is no evidence that the State's Pesticide Plan collects data on the coast
52	Need more regular monitoring of drinking water for pesticides/herbicides; designated uses and water quality standards in coastal watersheds are not protected.
53	I know our drinking water plants test SOC's every three years, how do you trend that?
54	Our comments address the inadequacies of Oregon's existing program to implement the required CZARA management measures, its inability and disinterest in evaluating the sufficiency of those management measures to ensure pesticides do not violate Oregon's water quality standards and impair its designated uses, its lack of a monitoring program to support such an evaluation, and its lack of practices that protect
55	Beyond Toxics report on pesticide/herbicide use in forestry shows that FPA lacks any program to protect Oregon streams and their beneficial uses (see report attached). Requires no pesticide buffer on non-fish streams even though neighboring states (WA, ID) require 25ft buffers. In non-fish bearing streams,
56	Oregon has no program to determine the presence of forestry pesticides in the air and resulting in drift and deposition onto surface waters and soils.
57	Oregon must develop a research program to determine if aerial application of herbicides is necessary for timber production. Oregon needs additional management measures to protect uses and water quality from
58	ODF has developed extensive guidelines for implementing the Oregon Forest Practices Act rules for herbicide applications to forest lands. See Oregon Department of Forestry, Forest Practice Rule Guidance: Chemicals and Other Petroleum Products (2009), available at http://goo.gl/uv8oIH . Also cite pesticide
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61	· Very narrow or non-existent buffers along streams that flow into Siletz. Clear cut to banks and aerial spraying over cuts.
62	OR must increase buffers for the application of pesticides to both fish and non-fish bearing streams and take other actions to prevent pesticides from entering water that affects people, fish, and wildlife. Community watersheds are routinely exposed to the timber industry's aerial spraying of toxic pesticides.
63	Oregon riparian buffers for pesticide use are woefully inadequate. Does not agree with EPA/NOAA that Oregon "may" have adequate stream buffers for pesticide use on streams with salmon but is encouraged that NOAA/EPA find that the state doesn't have good buffers on non-fish bearing streams. Most drinking
64	DEQ monitoring in Jetty Creek after spray was positive for glyphosate showing legal buffers aren't working.

	B
65	·NOAA/EPA need to require Oregon to provide not only a solid framework of basic management measures, but also a detailed and concrete list of additional management measures to actually protect riparian areas, and provide substantially increased protections for fertilizer, herbicide and pesticide applications near fish-
66	State is not doing enough to prevent polluted runoff from forestry--especially related to timber harvesting and riparian protection (fish and nonfish-bearing streams and for pesticide application).
67	Drinking waters are surrounded by private forest land or are below forest operations. 20ft buffers on fish-bearing streams do not protect from sedimentation and pesticide/herbicide use.
68	EPA and NOAA improperly assume that, should riparian buffer standards for type N streams and monitoring programs within the coastal zone adhere to existing state laws and programs concerning water quality and pesticides, then Oregon's CNPCP would warrant approval. We disagree because existing state and federal laws fail to address large swaths of the pesticide application activities and fail to collect critical pesticide
69	3) Aerial herbicide sprays regularly occur directly over headwaters and tributaries of protected salmon
70	4) Oregon permits pesticides to be sprayed with only the smallest protective buffer of 60 feet from salmon and steelhead streams—a buffer significantly smaller than other Northwest states with similar forest and
71	Supports Beyond Toxics Comments. Need mandatory spray buffers and vegetated riparian zone. Buffers around streams.
72	ODF rules require no buffer on type N streams even if they are the headwaters of streams which provide habitat for fish, including endangered coho. Extensive pesticide applications blanket these small streams, allowing these dangerous compounds to move downstream of harvest areas to areas inhabited by fish . When no buffer of any kind is required, it is obvious that pesticides get into these streams when the land on
73	Without requirements for a riparian leave zone, there is no possibility for limiting the amount of pesticide reaching such small streams. A mandated spray buffer would provide some protection for these small streams, but a vegetated riparian zone would provide much better protection because it would allow some
74	NMFS recommended buffers range from 150-300ft far above 20ft that OR has (only for fish-bearing).
75	Need larger spray buffers (may be better than multi-agency approach that attempts to monitor pesticide impacts).
76	ODF Rules to protect fish-bearing streams are inadequate to protect threatened and endangered species.
77	Many water bodies have no mandatory application buffer, so chemical may be sprayed to the water's edge, and some level of overspray, indirect drift and delivery by surface runoff by groundwater transport through soil macropores into adjacent waters is inevitable. These include headwater streams above fish barriers and
78	Riparian retention rules that allow extensive thinning on riparian standards to within 20' of the water's edge result in a riparian vegetative buffer that may be highly porous to aerial drift, rather than dense, unlogged
79	Oregon needs greater controls on spraying chemicals such as pesticides and herbicides in coastal watersheds, especially near streams.
80	Especially concerned about inadequate buffer for aerial spray pesticide application. Oregon has an inadequately small no-spray buffer zone around fish-bearing streams and no effective program to protect
81	Compared to neighboring states, Oregon has an inadequately small no-spray buffer zone around fish-bearing streams and no effective program to protect non-fish bearing streams.

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82	EPA & NOAA have found that Oregon forests have adequate stream buffers for pesticides on salmon bearing streams. How was this determined? Seasonal and non-fish bearing streams have not been considered. Isn't this the water that feeds the fish-bearing streams and rivers? Stream buffers and logging practices in this state are a joke--a sad joke. Observations, including photos of streamside vegetation, are evidence that Oregon is out of compliance; often with its own inadequate forest practices act. How did EPA find otherwise?
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86	· Concerned about contamination of drinking water (Newport gets water from Siletz), fish and soil contamination from spraying. Criminal that state does not provide better protections..especially as rate of clear cutting/forestry activities increase due to increase in China exports.
87	· No pesticide mngt measures are in use in ag. lands.
88	Thinks NOAA/EPA are wrong for lauding Oregon's Pesticide Stewardship Partnership Program when there
89	5) Stricter chemical and pesticide rules apply in neighboring states with heavy forestry industries.
90	Despite the lack of any additional ODA rules beyond the EPA pesticide labels, which have been demonstrated to be inadequate for protection of threatened coho, EPA and NOAA have not made any findings on the adequacy of Oregon's program to protect water quality and designated uses from pesticides
91	There are no additional ODA rules other than EPA labels that agricultural applicators need to adhered to.
92	Verifiable management measures are needed to ensure that water quality is protected
93	Our comments address the inadequacies of Oregon's existing program to implement the required CZARA management measures, its inability and disinterest in evaluating the sufficiency of those management measures to ensure pesticides do not violate Oregon's water quality standards and impair its designated uses, its lack of a monitoring program to support such an evaluation, and its lack of practices that protect
94	Beyond Toxics report on pesticide/herbicide use in forestry shows that FPA lacks any program to protect Oregon streams and their beneficial uses (see report attached). Requires no pesticide buffer on non-fish streams even though neighboring states (WA, ID) require 25ft buffers. In non-fish bearing streams,
95	The EPA should require ODF, in consultation with DEQ, to exercise their authority to review, comment, and require modifications of forest vegetation management written plans based on an environmental and water quality risk assessment and proof of compliance with state and federal laws.
96	The AWQMP (and AWQMA Rules) meets and exceeds the federal statutory and regulatory requirements of CZARA
97	NOAA/EPA don't provide scientific data or substantial evidence that identifies agriculture land uses as a cause or significant contributor to water quality impairment in Oregon's coastal streams. There is no sound scientific evidence to demonstrate that agriculture lands within the coastal zone in fact cause or significantly contributing to water quality degradation. ODA is required to regulate, based on science, those agriculture

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98	Nowhere does CZARA or Section 6217(g) unconditionally require: (1) riparian buffers on agriculture land, (2) that landowners undertake efforts to restore lands to pre -agricultural uses and methods (removing agriculture from the land), (3) management measures that will not result in a reduction of nonpoint source pollution, (4) new or ad hoc water quality standards for pesticides, sediment, or any other listed pollutants, or (5) landowners to change land uses, implement management measures, or otherwise employ
99	Oregon law encompasses all the 6217(g) requirements for pesticide management including when and what conditions pesticides can be applied, mixed, stored, loaded or used. Application must also follow FIFRA pesticide labels. Required site vegetation will also help keep pesticides out of water. And pesticides aren't
100	Member of the Upper Willamette & Upper Siuslaw Agricultural Water Quality Management Area Local Advisory Committees. Met annually since then with our state and local officials, the Oregon Department of Agriculture, the Department of Environmental Quality(DEQ), and East Lane (county) Soil and Water Conservation District to be advised on the current status of the management plan. The committee was instructed that our plan would be complaint driven, and compliance voluntary. I have been informed that three fines have been imposed over the last 11 years. We were also told we were not allowed to consider pesticides as a pollutant. The state still does not consider pesticides as pollutants, but
101	Since 1998 there have been significant changes in how chemicals are applied to forests under FIFRA. Findings from the Spray Drift Task Force and other research led to revisions in chemical labeling. Pesticide applicators are licensed under FIFRA and recent court rulings have further increased regulation of applicators and land owners. Oregon's Forest Practices Act rule guidelines state that applications must
102	ODF has developed extensive guidelines for implementing the Oregon Forest Practices Act rules for herbicide applications to forest lands. See Oregon Department of Forestry, Forest Practice Rule Guidance: Chemicals and Other Petroleum Products (2009), available at http://goo.gl/uv8oIH . Also cite pesticide
103	Pesticide Stewardship Programs, CAFO, and AWQMP already in place.
104	ODF and ODA's pesticide use programs fail to control polluted runoff from logging, in Type N streams, and cattle operations.
105	Watershed council completed a herbicide monitoring program found runoff from all sources of applications – road side use, and agricultural and forestry operation. While they may have applied it correctly there was
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108	Attempting to relocate during spray/burn events causes financial hardship and spray/burn permits can last for months. Owners are given no warning when activities will occur. Property values are lowered and no one would buy home if tried to sell due to publicity of harmful forestry activities in area.
109	No coordination between DEQ/ODF to conduct pesticide monitoring in timely manner and community is given no warning of spraying.
110	Sept. 16, 2012. observed aerial spraying taking place in their watershed, without warning. Applied MSO, Agsurf Sulfomet Extra Herbicide, and Accord XRT II ("industrial herbicide")
111	ODF does not inform the public of the exact date of an activity such as aerial sprying nor which chemicals will actually be used.
112	Notices were received about aerial spaying to occur in the next 6 months in the watershed by Olympic Resource Management and Stimson Lumber for numerous pesticides, but no specific dates provided.

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113	There is no official process in place to inform businesses and residents of upcoming spraying.
114	Asked ODF to notify about pesticide use, then were not notified.
115	Concerned about ODF's vague public notification requirements when spraying.
116	The Department of Forestry's notification of spray requirements are extremely vague.
117	Pesticide application records are not available to the public. Spray records are kept by the applicator. Only the State Forester can request actual application records.
118	The Oregon Health Authority's only protections are to inform the residents of Hwy 36 corridor that they and their watersheds will continue to be poisoned as usual, and that Oregon's spring poisoning season has already started.
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121	EPA has not revised its pesticide labels to reflect the restrictions NMFS said were necessary to protect ESA-
122	Oregon has no program to determine if federal label laws are being complied with.
123	Evidence suggests that federal label restrictions for Atrazine, an Oregon-regulated herbicide, are not being followed. Also, poor record-keeping on pesticide applications
124	There may have been a violation of a 2004 court that required 300' buffers for pesticide application for 2,4-D.
125	FPA aerial and ground spray buffers are smaller than EPA legal requirements for atrazine. EPA labeling requires a 66' buffer for aerial and ground spray, but actual application followed state guidelines of 60'
126	NOAA/EPA don't provide scientific data or substantial evidence that identifies agriculture land uses as a cause or significant contributor to water quality impairment in Oregon's coastal streams. There is no sound scientific evidence to demonstrate that agriculture lands within the coastal zone in fact cause or significantly contributing to water quality degradation. ODA is required to regulate, based on science, those agriculture
127	Oregon law encompasses all the 6217(g) requirements for pesticide management including when and what conditions pesticides can be applied, mixed, stored, loaded or used. Application must also follow FIFRA pesticide labels. Required site vegetation will also elp keep pesticides out of water. And pesticides aren't
128	Since 1998 there have been significant changes in how chemicals are applied to forests under FIFRA. Findings from the Spray Drift Task Force and other research led to revisions in chemical labeling. Pesticide applicators are licensed under FIFRA and recent court rulings have further increased regulation of applicators and land owners. Oregon's Forest Practices Act rule guidelines state that applications must
129	ODF and ODA's pesticide use programs fail to control polluted runoff from logging, in Type N streams, and cattle operations.
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132	·Water District tried to prevent the spraying of fertilizers, herbicides and pesticides inside the Clear Lake watershed. The board was informed that there was nothing that could be done until it could be proven that something had actually harmed the water - after the spraying had been allowed. The District had to explain to customers that it has no power to prevent non-point pollution of Clear Lake, short of litigation after the fact.
133	·The protection zone language for herbicide spraying was purposefully written by Lane County to be completely ineffective as far as application to logging operations inside the watershed, and minimal as to
134	Since 1998 there have been significant changes in how chemicals are applied to forests under FIFRA. Findings from the Spray Drift Task Force and other research led to revisions in chemical labeling. Pesticide applicators are licensed under FIFRA and recent court rulings have further increased regulation of
135	applicators and land owners. Oregon's Forest Practices Act rule guidelines state that applications must
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138	A five year history of pesticide use in the watershed was not available from ODF when requested.
139	EPA and NOAA improperly assume that, should riparian buffer standards for type N streams and monitoring programs within the coastal zone adhere to existing state laws and programs concerning water quality and pesticides, then Oregon's CNPCP would warrant approval. We disagree because existing state and federal
140	laws fail to address large swaths of the pesticide application activities and fail to collect critical pesticide
141	6) Under the current administrative rules, the Oregon Forest Practices Act prohibits researchers, doctors and the public from obtaining accurate information about what types and quantities of herbicides are sprayed
142	Pesticide application records are not available to the public. Spray records are kept by the applicator. Only the State Forester can request actual application records.
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145	impacts to their land from adjacent chemical use far exceed value of timber cut on adjacent land
146	2) Oregon does not require a no-spray buffer near homes and schools.
147	Assisted in developing the response for Beyond Toxics of Eugene in developing information for their comment letter. The comments show that current pesticide management resulted in extensive spraying over small, non-fish bearing streams, primarily headwaters of streams which provide habitat for
148	Oregon's management measures for pesticides are not adequate to meet water quality standards including full support of designated uses in Oregon and additional management measures are required.
149	Herbicides (e.g., Atrazine) can persist in water and can bind with soil particles, so under OR's FPA, pesticides such as atrazine are sprayed into dry channels that become active in wetter months, carrying herbicides

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150	Supports pesticide-free buffers around schools, such as near Triangle Lake.
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154	Evidence suggests that federal label restrictions for Atrazine, an Oregon-regulated herbicide, are not being followed. Also, poor record-keeping on pesticide applications
155	There may have been a violation of a 2004 court that required 300' buffers for pesticide application for 2,4-D.
156	Since 1998 there have been significant changes in how chemicals are applied to forests under FIFRA. Findings from the Spray Drift Task Force and other research led to revisions in chemical labeling. Pesticide applicators are licensed under FIFRA and recent court rulings have further increased regulation of applicators and land owners. Oregon's Forest Practices Act rule guidelines state that applications must
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	C	I	J	K
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4	Pg. #	Category of Comment		
5				
6	1	Program-general		H.7(i)
7	5	Program - general		H.7(h)
8	1	Program-General		H.7(i)
9	1	Program - general		H.7(i)
10		Program - general		address later
11	2	Program - general; Program - notification		address in notification
12	1	Program - general		H.7(i)
13	1	Program - general		H.7(i)
14	1	Program - general		H.7(i)
15	5	Program - General	H.7(a), H.7(b), H.7(c)	
16	6	Program - General		H.7(i)
17	7	Program - General		H.7(i)
18	1	Program - general; Program - monitoring		H.7(i), H.7(g)
19	1	Program - general		H.7(i)
20	1	Program - General; Env - Fish toxicity; Health - general		H.7(i)

	C	I	J	K
21	3	Program - General; Env - Fish toxicity; Health - general		H.7(i)
22	3	Program-General; Program-Monitoring		H.7(g)
23	6	Program-General; Program-Monitoring		H.7(g)
24	5	Program-General (Triangle Lake)		H.7(e)
25	6	Program - General - Need Mandatory Buffers and Vegetated Riparian Zone		H.7(h)
26	6	Program - General, Program - Type N&F Buffers		H.7(i)
27	3	Program - General		H.7(e)
28	4	Health - Drinking Water, Program General		H.7(b)
29	1	Program - General		H.7(i)
30	2	Program - General		H.7(i)
31	1	Program - General		H.7(i)
32				
33				
34	1	Program -Monitoring		H.7(g)
35	1	Program-Monitoring, Health-Drinking Water		H.7(b)
36		Program Monitoring	comment not relevant to CZARA decision	H.7(g)
37	4	Program - monitoring		H.7(g)
38	2	Program-Monitoring, Program-Spray		H.7(g)

	C	I	J	K
39	Att. P.3	Program - monitoring		H.7(g)
40	Att. P.4	Program - monitoring		H.7(g)
41	Att. P.4	Health - chemical effects; Program - monitoring		H.7(g)
42	2	Program - Monitoring		H.7(g)
43		Program -Monitoring		H.7(g)
44	1	Program - general; Program - monitoring		H.7(g)
45	2	Program – Monitoring		H.7(g)
46	2	Program – Monitoring		H.7(g)
47	3	Program-General; Program- Monitoring		H.7(g)
48	3	Program - Type "N"; Program - Monitoring; Program - Spray Records		H.7(g)
49	6	Program-General; Program- Monitoring		H.7(g)

	C	I	J	K
50	49	Program-Monitoring		H.7(g)
51	49	Program - Monitoring		H.7(g)
52	1	Program – Monitoring		H.7(g)
53	3	Program – Monitoring		H.7(g)
54	1	Program - State Programs, Program monitoring, Env-General		H.7(g)
55	2	Program - State Programs, Program monitoring, Env-General		address in buffers
56	3,4	Program Monitoring		H.7(g)
57	5	Program Monitoring - Research		H.7(g)
58	19	Program - Monitoring; Program - State Programs		H.7(g)
59			general buffer comment?	
60			general buffer comment?	
61	1	Program- Type N, Program- Type F	general buffer comment?	H.7(h)
62	3	Program - type N buffers; Program - type F buffers; Health - drinking water		H.7(h)
63	4	Program - type N buffers; Program - type F buffers; Health - drinking water		H.7(h)
64	4	Program - type N buffers; Program - type F buffers		H.7(h)

	C	I	J	K
65	4	Program – Type “N” Buffers; Program – Type “F” Buffers		H.7(h)
66	2	Program – Type “F” Buffers; Program - Type "N" Buffers	Program - other (schools, homes)	H.7(h)
67	2	Health -Drinking Water, Program - Type F Buffers		H.7(h)
68	3	Program - Type "N"; Program - Monitoring; Program - Spray Records		H.7(h)
69	6	Program-Type N		H.7(h)
70	6	Program - Type "F" Buffers;		H.7(h)
71		Program- Buffers N&F and mandatory riparian zone		H.7(h)
72		Program - Type N		H.7(h)
73	6	Program - General - Need Mandatory Buffers and Vegetated Riparian Zone		H.7(h)
74	3	Program - Type "F" Buffers		H.7(h)
75	3	Program - Type "F" Buffers; Type "N" Buffers		H.7(h)
76	47	Program - Type "F" Streams		H.7(h)
77	53	Env-drift; Program-Type "N" Buffer; Program-Type "F" Buffer; Env-General		H.7(h)
78	53	Program-Type "F" Buffer; Env-Drift		H.7(h)
79	6	Program - General, Program - Type N&F Buffers		H.7(h)
80		Program – Type “N” Buffers		H.7(h)
81	3	Program – Type “N” Buffers; Program – Type “F” Buffers		H.7(h)

	C	I	J	K
82	1	Program – Type “N” Buffers		H.7(h)
83				
84				
85				
86	1	Health-Drinking Water, Env-Fish, Programs-State Programs	comment not relevant to CZARA decision	H.7(b)
87	1	Programs-State Programs		H.7(i)
88	4	Program - State programs		H.7(g)
89	6	Program-State Programs		H.7(i)
90	49	Program - State Program		H.7(i)
91	49	Program - State Program		H.7(i)
92	3	Program – State Programs		H.7(i)
93	1	Program - State Programs, Program monitoring, Env-General		H.7(i)
94	2	Program - State Programs, Program monitoring, Env-General		H.7(i)
95	4,5	Program -State Programs		H.7(i)
96	2, 11, 12, 13, 14	Program - State Programs		ag comment?
97	4	Program - FIFRA, Program - State Programs		ag comment?

	C	I	J	K
98	6	Program - State Programs		ag comment?
99	13	Program - State Programs, Program - FIFRA		H.7(i)
100	1	Program – State Programs		H.7(i)
101	19	Program - State Program; Program - FIFRA; Program - Enforcement; Program - Scope of Authority		H.7(i)
102	19	Program - Monitoring; Program - State Programs		H.7(i)
103	1	Program - State Programs		H.7(i)
104	1	Program - FIFRA, Program - State Programs		H.7(i)
105	2	Program - State Programs		H.7(e)
106				
107				
108	2	Program - general; Program - notification		H.7(j)
109	2	Program-Monitoring; Program- notification		H.7(j)
110	Att. P.3	Program - notification		H.7(j)
111	Att. P.3	Program - notification		H.7(j)
112	Att. P.4	Program - notification		H.7(j)

	C	I	J	K
113	Att. P.4	Program - notification		H.7(j)
114	5	Program – Notification		H.7(j)
115	2	Program - Spray Notification		H.7(j)
116		Program - Notification		H.7(j)
117	1	Program-Spray Revords; Program-Notification		H.7(j)
118	2	Program – Notification		H.7(j)
119				
120				
121	4	Program - FIFRA		H.7(k)
122	5	Program - FIFRA		H.7(k)
123	6	Program - Enforcement, Program - FIFRA		H.7(k)
124	12-15	Program - Enforcement, Program - FIFRA		H.7(k)
125	19-22	Program - FIFRA		H.7(k)
126	4	Program - FIFRA, Program - State Programs		ag comment?
127	13	Program - State Programs, Program - FIFRA		H.7(k)
128	19	Program - State Program; Program - FIFRA; Program - Enforcement; Program - Scope of Authority		H.7(i)
129	1	Program - FIFRA, Program - State Programs		H.7(i)
130				
131				

	C	I	J	K
132	3	Program – Scope of Authority		H.7(i)
133	3	Program – Scope of Authority		H.7(i)
134	19	Program - State Program; Program - FIFRA; Program - Enforcement; Program - Scope of Authority		H.7(i)
135				
136				
137				
138	Att. P.3	Program - spray records		H.7(l)
139	3	Program - Type "N"; Program - Monitoring; Program - Spray Records		H.7(h)
140	6	Program-Spray Records		H.7(l)
141	1	Program-Spray Records; Program-Notification		H.7(l)
142				
143				
144				
145	5	Program – Other		H.7(j)
146	6	Program - other;		H.7(h)
147		Program - Other data shows impacts from spraying		H.7(i)
148	47	Program-Other		H.7(i)
149	4	Env - Fish Toxicity, Program Other		H.7(e)

	C	I	J	K
150	2	Program - Other (schools, homes)		H.7(h)
151				
152				
153				
154	6	Program - Enforcement, Program - FIFRA		H.7(k)
155	12-15	Program - Enforcement, Program - FIFRA		H.7(k)
156	19	Program - State Program; Program - FIFRA; Program - Enforcement; Program - Scope of Authority		H.7(i)
157				
158				

	A	B	C	I
1				
2	Legal-Other	General		
3	Draft 7/1/2014			
4				
5	Legal-Other			
6	Comment Code	Summary Main Comments	Pg. #	Category of Comment
7	46-J	It appears that little is understood by chemical users of the impacts these chemicals have on their neighbors, adjoining watersheds and the larger community. It seems taken for granted that the laest and instructions of the chemical company is all they need to consider, because that is the legal requirement. The ODF and legal system supports use of harmful chemicals.	2	Legal - Other
8	46-P	We have a right to know what are in the chemical compounds, including the inerts. Right to know what is in our air and water and may be causing health conditions such as liver disease, cancer, auto immune and reproductive illnesses. Changing our own and children's DNA.	7	Legal - Other

	J
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6	Notes
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